

EXHIBIT E

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE)
ANTITRUST LITIGATION)
) No. 11-CV-2509-LHK
THIS DOCUMENT RELATES TO:)
ALL ACTIONS.)
_____)

ATTORNEYS' EYES ONLY - HIGHLY CONFIDENTIAL

VIDEO DEPOSITION OF ARNNON GESHURI

AUGUST 17, 2012

Reported by: Rosalie A. Kramm, CSR No. 5469, CRR

10:15:35 1 fill that job through the various methods that you come
10:15:37 2 up with, it's up to that recruiter to get it done.

10:15:42 3 Q. And those methods included sourcing, correct?

10:15:46 4 A. Those methods included sourcing.

10:15:50 5 Q. Do you have any idea in terms of breakdown by

10:15:54 6 time what proportion of time that the recruiting

10:15:59 7 organization spent on the sourcing part of it in terms of

10:16:03 8 relying on that sourcing method.

10:16:05 9 MR. RUBIN: You're saying in terms of person

10:16:07 10 hours?

10:16:08 11 MR. HARVEY: Yes.

10:16:12 12 THE WITNESS: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:16:46 21 BY MR. HARVEY:

10:16:47 22 Q. But the primary responsibility of a recruiter
10:16:50 23 is to find good people, correct?

10:16:52 24 A. The primary responsibility is to find good

10:16:54 25 people that will fit the roles within the company, the

10:16:58 1 company's needs at the time.

10:16:59 2 Q. And so -- okay. That's fine.

10:17:16 3 And the recruiting organization, I believe you

10:17:19 4 said that when you were hired, there were [REDACTED] people in

10:17:22 5 this organization, and when you left, there were

10:17:24 6 approximately [REDACTED] correct?

10:17:27 7 A. Not exactly. So during the heyday, or as we

10:17:32 8 ramped up, we -- we hit around [REDACTED] staffing

10:17:37 9 professionals in the company. But when I left, it was a

10:17:41 10 different number, which I don't -- I don't know, because

10:17:43 11 I was out of that role when I left the company.

10:17:46 12 So -- so basically -- but during its most

10:17:49 13 prolific time, it was around [REDACTED] people.

10:17:53 14 Q. And what years fell into this prolific period?

10:17:57 15 A. It was probably the -- well, it wasn't

10:17:59 16 immediate, because I had to build up to that. So it was

10:18:02 17 probably -- maybe my second or third year there, those

10:18:06 18 are the two -- the two years.

10:18:08 19 Q. So 2005, 2006?

10:18:10 20 A. This was -- yeah, and I think that was parallel

10:18:14 21 to the growth of the company. We can look at the

10:18:16 22 headcount numbers of the company, but you can see how it

10:18:19 23 was a pretty big spike in growth.

10:18:21 24 Q. Sure. And let's see.

10:18:24 25 When you became the director of HR, I take it

10:18:29 1 in approximately the beginning of 2009, roughly how many
10:18:32 2 people worked in the recruiting organization?

10:18:36 3 A. I -- I don't -- I actually don't recall.

10:18:39 4 Q. Was it [REDACTED]

10:18:41 5 A. Yeah, I -- I don't -- I don't recall. It was

10:18:43 6 [REDACTED], but I don't -- I don't recall the exact
10:18:46 7 number when I left.

10:18:52 8 Q. Did you rely exclusively on Google employees as
10:18:55 9 part of this recruiting function, or did you also
10:18:57 10 occasionally rely on third-party recruiters?

10:19:01 11 MR. RUBIN: Objection. Vague as to "third
10:19:03 12 parties."

10:19:04 13 THE WITNESS: Describe third-party recruiters
10:19:06 14 to me, if you don't mind.

10:19:08 15 BY MR. HARVEY:

10:19:08 16 Q. Anyone who would recruit on Google's behalf who
10:19:12 17 was not on Google's direct payroll.

10:19:14 18 MR. RUBIN: Same objection.

10:19:16 19 THE WITNESS: So we -- so -- from my -- from
10:19:22 20 how we structure the organization, [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

10:19:38 24 BY MR. HARVEY:

10:19:40 25 Q. Would you use -- well, were there any other

10:22:57 1 and utilize, and that was -- that was how they structured
10:23:03 2 their organization.

10:23:05 3 Q. [REDACTED]

[REDACTED]
10:23:11 5 A. There were -- if I recall correctly, there were
10:23:14 6 [REDACTED] at the time. It was just [REDACTED] recruiters when I first
10:23:18 7 started. [REDACTED]

10:23:20 8 Q. [REDACTED]
[REDACTED]

10:23:25 10 MR. RUBIN: Objection. Vague.

10:23:27 11 THE WITNESS: [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

10:23:58 18 BY MR. HARVEY:

10:23:58 19 Q. [REDACTED]
[REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED]
[REDACTED]

10:24:18 1 Q. Do you remember whether it was in 2004 or 2005?

10:24:23 2 MR. RUBIN: Objection. Calls for speculation.

10:24:24 3 THE WITNESS: Yeah, I still don't remember

10:24:25 4 exactly when we hired the first sourcer. It's just not

10:24:28 5 specific to me. I can't remember.

10:24:30 6 BY MR. HARVEY:

10:24:30 7 Q. How many people worked in sourcing when it was

10:24:33 8 at its largest size?

10:24:36 9 A. I -- I probably had -- of order of magnitude,

10:24:44 10 probably [REDACTED]
[REDACTED]
[REDACTED]

10:24:49 12 Q. Oh, so you're including that within the [REDACTED]?

10:24:53 13 A. Yeah.

10:24:53 14 Q. In terms of --

10:24:53 15 A. I said that -- before I mentioned [REDACTED] staffing

10:24:55 16 overall.

10:24:56 17 Q. I see. Thank you.

10:25:09 18 And then moving on to your final role at

10:25:11 19 Google, when you were director of HR, could you -- could

10:25:18 20 you kind of describe categories of responsibilities you

10:25:22 21 had in that role.

10:25:24 22 A. Yeah. I -- I was basically responsible for --

10:25:29 23 for a specific area within -- within the engineering

10:25:32 24 organization to support the employee base. So that means

10:25:35 25 that I handled employee relations issues. I helped to

10:25:44 1 deal with, you know, personal -- or like ergonomic
10:25:50 2 issues, when people had problems with their work space,
10:25:53 3 or if they had medical problems how they got on
10:25:55 4 disability and things like that. So I basically just
10:25:57 5 handled a variety of employee issues to help -- to help
10:26:01 6 those groups function within the work environment.

10:26:12 7 Q. And did you have any other responsibilities
10:26:14 8 while you were in HR, aside from the ones that you
10:26:18 9 described?

10:26:18 10 A. There was a variety -- whatever it was -- there
10:26:19 11 was a variety of roles, but it all focused on -- Dean, it
10:26:23 12 all focused on the -- the interaction of employees, you
10:26:28 13 know, if managers had a low performer, helping them walk
10:26:31 14 through that, how to -- how to help that employee get
10:26:35 15 better or whatever else we need to do. So that -- so
10:26:38 16 basically I was -- I was responsible for helping managers
10:26:41 17 and employees just deal with the work environment. But
10:26:44 18 the issues were pretty varied, and I just helped to --
10:26:47 19 helped them to make it through the -- make it through and
10:26:50 20 be a better -- better person as an outcome.

10:27:37 21 MR. HARVEY: I believe this is Exhibit 170. If
10:27:38 22 you could please mark this and hand it to the witness.

10:27:41 23 (Exhibit 170 was marked for identification.)

10:27:41 24 BY MR. HARVEY:

10:27:42 25 Q. This document is a PDF of the current bios of

12:28:20 1 drive that.

12:28:24 2 Q. But that included sourcing, correct?

12:28:26 3 A. It includes sourcing.

12:28:28 4 Q. The email continues, "However, we do need to be

12:28:30 5 respectful" -- I'm sorry, "we do need to be respectfully

12:28:33 6 and sensitive about how we do it. I don't think this is

12:28:35 7 consistently happening. One practical suggestion that

12:28:39 8 came up today that we can tell recruiters as a tangible

12:28:41 9 action item --"

12:28:43 10 MR. RUBIN: You might need to go a little

12:28:45 11 slower for the court reporter, when you're reading.

12:28:52 12 THE REPORTER: It would be swell.

12:28:54 13 MR. HARVEY: I will be slower. Thank you.

12:28:56 14 Q. I'll start with, [REDACTED]

12:29:32 25 Were -- let me pause here.

Deposition of Arnon Geshuri

In Re: HIGH-TECH EMPLOYEE ANTITRUST LITIGATION

12:29:39 1 Was it your understanding that Google's
12:29:42 2 recruiters were permitted to call into companies with a
12:29:46 3 specific individual they were chasing?

12:29:50 4 A. So I -- this was a -- this was early on. I
12:29:53 5 just -- I just got there, so I was just getting my
12:29:56 6 footing. But historically, when I ran staffing
12:30:00 7 organizations, recruiters of course used sourcing as
12:30:04 8 of the methodologies to go and get people.

12:30:07 9 Q. Okay. And then you responded, what looks like
12:30:12 10 the next day, and you say, [REDACTED]

12:30:54 23 Q. What kind of pressure did you receive to meet
12:30:56 24 your goals?

12:30:58 25 A. The -- the company -- the -- the company had --

12:31:02 1 I mentioned this before in testimony, where the company
12:31:04 2 had a hiring plan, and -- and I'm -- personally, I'm a
12:31:10 3 very achievement-oriented person, and so you give me a
12:31:14 4 plan and I will make sure that we as an organization will
12:31:17 5 hit -- hit the numbers.

12:31:19 6 So -- so the pressure I felt was partially my
12:31:25 7 own pressure to make sure we delivered, and also I wanted
12:31:29 8 to make sure the company got the talent it needed to
12:31:32 9 achieve. So each organization needed great talent, and I
12:31:36 10 delivered.

12:31:37 11 Q. Did Shona Brown and Laszlo Bock make that
12:31:40 12 clear, that -- that Google's expectation was that you
12:31:43 13 would meet your goals?

12:31:45 14 A. Well, what they said to me, or what I perceived
12:31:49 15 they said is, "Your job is to fill roles. Your job is to
12:31:52 16 bring talent in, and that's -- that's -- that's your
12:31:55 17 responsibility." And I was fully accountable for that
12:32:00 18 and fully accountable to make sure that Google grew. And
12:32:03 19 it was made very clear.

12:32:05 20 And Laszlo was not part of the picture at this
12:32:08 21 point in time. He was hired after this. But Shona made
12:32:12 22 it very clear for me that I was brought onboard to build
12:32:15 23 an amazing talent organization, recruiting organization.

12:33:03 24 Q. When you were first hired at Google, or any
12:33:05 25 time thereafter, did you ever have a discussion with

1 I, Rosalie A. Kramm, Certified Shorthand
2 Reporter licensed in the State of California, License No.
3 5469, hereby certify that the deponent was by me first
4 duly sworn and the foregoing testimony was reported by me
5 and was thereafter transcribed with computer-aided
6 transcription; that the foregoing is a full, complete,
7 and true record of said proceedings.

8 I further certify that I am not of counsel or
9 attorney for either of any of the parties in the
10 foregoing proceeding and caption named or in any way
11 interested in the outcome of the cause in said caption.

17 X Reading and Signing was requested.

18 _____ Reading and Signing was waived.

19 _____ Reading and signing was not requested

20 | Page

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